

# APPENDIX B

**INDEX IN SUPPORT OF MOTION TO SEAL**

<b>Material/Title of Document</b>	<b>Basis for Sealing (Legitimate Private or Public Interest Which Warrant the Relief Sought)</b>	<b>Clearly Defined and Serious Injury that Would Result if Relief is Not Granted</b>	<b>Why a Less Restrictive Alternative to the Relief Sought is Not Available</b>	<b>Any Prior Order Sealing the Same Materials in the Pending Action</b>	<b>Party in Opposition to Sealing, if any, and Basis</b>
Transcript, dated June 27, 2023 at 53:21-23 (“final . . . communication”), 54:1-2 (“updated . . . team”), and 54:3-8 (“ . . . it” and “Good . . . off”): discussion of Exhibits 2, 33, and 34 to the June 23, 2023 joint letter (ECF No. 123).	JHCS requests the sealing of a portion of a transcript that is not known to the general public and which references documents that the parties agreed to keep confidential. JJHCS maintains that this transcript contains sensitive business information, including discussion of confidential documents pertaining to the administration of the CarePath program.	<p>If filed on the public docket, this transcript will reveal confidential material relating to JJHCS’s sensitive business information.</p> <p>Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. JJHCS is proposing a limited number of redactions, which is the least restrictive alternative available.	None.	None.